

EXHIBIT L

Querns, Ann E.

From: Bologna, Jason (USAPAE) <Jason.Bologna@usdoj.gov>
Sent: Friday, September 11, 2020 3:12 PM
To: Querns, Ann E.
Subject: FW: Nikpavar-Fard - Discovery
Attachments: 02DEA2File45Att1.xlsx; 02DEA2File45Att2.pdf; 02DEA2File45Att3.pdf; 02DEA2File49PoliceRept.pdf; 06HHSScan66Att.pdf; 06HHSScan6411314Letter.pdf; N75.pdf; PADOLWageRecordsGJEx107,107A,107B.pdf; 02DEA2File17.docx

Ann,

I am forwarding discovery materials in the Nikparvar-Fard case that are responsive to the request you made on behalf of your client (cut/pasted below). When we last spoke, I indicated I would forward these materials with a cover letter addressing these documents and some additional discovery issues (e.g., the protocol for visiting DEA to inspect and copy AUC patient files, etc.). I am still working on those additional issues and the cover letter is, therefore, not complete. I didn't want to delay the passage of this discovery any further, so I am passing these materials now without a cover letter. I will incorporate their passage into the cover letter once it is finalized (i.e., the following materials were provided to you by email on September 11, 2020). I hope that makes sense.

Please let me know if you have any questions about these materials or this message.

Sincerely,
Jason

- a. Exhibit N73 is listed as "passed" but it does not appear in the discovery materials. Exhibits N72 and N74 appear on Disc 3. This is the flashdrive that was received from Dr. [REDACTED]. Please produce.
- b. In the Jencks material at Interviews, 02 DEA 2, File 17, reference is made to an email from Dr. [REDACTED] to [REDACTED]. Please confirm whether this email was produced and if not, produce it.
- c. In the Jencks material at Interviews, 02 DEA 2, File 45, the interview with [REDACTED] indicates documents should be attached but none are attached. Please produce. There is also reference in this interview to PDMP records. Please also produce those.
- d. In the Jencks material at Interviews, 02 DEA 2, File 24, reference is made to the acquisition of N75. N75 is not listed on the discovery chart and was not produced. Please produce.
- e. In the Jencks material at Interviews, 02 DEA 2, File 47, at paragraph eight, a reference is made to an email between Campbell and Nikpavar-Fard. If this document was produced to the Government, we request it be produced.
- f. In the Jencks materials at Interviews, 02 DEA 2, File 49, at paragraph 9, a police report is referenced. Please produce the police report.
- g. GJ Exhibit 107, 107A, and 107B are all summaries of data reported to the PA-DOL for AUC Entities. Please produce the underlying data.

- h. In the Jencks materials, at interviews, 06 HHS, Scan 64, under the heading Document, a 1/13/14 letter is referenced as being shown to Ms. [REDACTED]. The letter is listed as being attached, but no documents are attached. Please produce that letter.
- i. In the Jencks materials, at interviews, 06 HHS, Scan 66, Reviewed documents are listed as being attached, but no documents are attached. Please produce these attachments.
- j. In the Jencks materials, at Grand Jury Exhibits, Investigations, File 14-49-10149-3, on page three, references photographs of the Scranton facility. Please produce these photographs.
- k. In the Jencks materials, at Grand Jury Exhibits, Investigations, File 14-49-10149-2, many items are listed as being attached, in particular item 34, a coroner's report on Meharg's death. Please produce the attachments.
- l. In the Jencks materials, at Grand Jury Exhibits, Investigations, File 14-49-10149-1, many items are listed as being attached, attachments 13 and 14. Please produce the attachments.

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